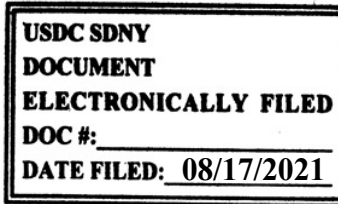


Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, New York 10022

troutman.com



troutman
pepper
MEMO ENDORSED

Valerie Sirota
D 212.704.6067
valerie.sirota@troutman.com

August 17, 2021

VIA ECF

The Honorable Gregory H. Woods
United States District Court for the Southern
District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007-1312

APPLICATION GRANTED: Defendant's deadline to respond to the Complaint is hereby extended to October 5, 2021. The Initial Case Management Conference in this matter scheduled for Wednesday, September 8, 2021 at 11:30 a.m. is hereby rescheduled to Tuesday, October 19, 2021, at 11:30 a.m. Counsel for the parties are directed to call Judge Parker's AT&T conference line at the scheduled time. Please dial (866) 434-5269; access code 4858267

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.
08/17/2021

Re: *Gordon Surgical Group, P.C. et al. v. Empire HealthChoice HMO, Inc. et al.*
Civil Action No. 1:21-cv-04796
Letter Motion for Extension of Time to Answer or Otherwise Respond to the Complaint and for Adjournment of Initial Case Management Conference

Your Honor:

We represent Defendants Empire HealthChoice HMO, Inc. and Empire HealthChoice Assurance, Inc. (collectively "Empire") in the above-referenced action.

With Plaintiff's consent, Empire respectfully submits its second request for an extension of time to respond to the Complaint. Pursuant to Rule 6 of the Federal Rules of Civil Procedure and Rule 1.E. of Your Honor's Individual Rules of Practice in Civil Cases, Empire states the following in support of its request:

1. The current deadline for Empire to file a response to the Complaint is August 20, 2021.
2. This is Empire's second request for an extension of the deadline to file a response to the Complaint.
3. The undersigned is still investigating the allegations in the Complaint and potential defenses. An extension of time should allow the undersigned sufficient time to obtain and review the necessary documentation and to draft an appropriate response to the Complaint.
4. Counsel for Plaintiff consents to this request for an extension.

The Honorable Gregory H. Woods
August 17, 2021
Page 2



For the foregoing reasons, Empire respectfully requests the Court extend the time for Empire to answer or otherwise respond to Plaintiff's Complaint until **October 5, 2021**.

Additionally, the parties request that the Initial Case Management Conference currently scheduled for September 8, 2021, be adjourned for thirty (30) days.

We thank Your Honor for your consideration of these requests. If Your Honor has any questions or concerns, please do not hesitate to contact my office.

Respectfully submitted,

A handwritten signature in black ink that reads "Valerie Sirota".

Valerie Sirota

cc: All Counsel of Record (via ECF)